

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

MICHAEL & MARGARET MACKRELL,)	Case No. 1:21-CV-203
)	
Plaintiffs,)	JUDGE SOLOMON OLIVER, JR.
)	
v.)	
)	
UNITED STATES OF AMERICA,)	
)	
Defendant.)	

STIPULATION FOR COMPROMISE AND SETTLEMENT OF VA CLAIM
("SETTLEMENT AGREEMENT")

Plaintiffs Michael and Margaret Mackrell and Defendant United States of America
hereby stipulate as follows:

1. The parties do hereby agree to settle and compromise each and every VA claim of any kind arising directly or indirectly from the related care provided in the above-captioned action under the terms and conditions set forth in this Settlement Agreement.
2. The United States of America agrees to accept the sum of sixty-thousand dollars (\$60,000) as full settlement and satisfaction of VA's medical care claim arising from treatment provided in the above-captioned action.
3. Plaintiff and his guardians, heirs, executors, administrators, or assigns hereby agree to pay the sum set forth in this Settlement Agreement in full settlement, satisfaction, and release of any and all claims, demands, rights, and causes of action.
4. The persons signing this Settlement Agreement warrant and represent that they possess full authority to bind the persons on whose behalf they are signing to the terms of the settlement.

5. Payment of the settlement amount will be made by check payable to:

**North Central CPAC
Attn: Cash Management
PO BOX 5117
Madison, WI 53705**

The check MUST state the Identification Title in the Memo Section to ensure proper processing.

The Identification title in this matter is: **541-M-20190404-45344**.

6. This Settlement Agreement contains the entire agreement between the parties with respect to the subject of this litigation and supersedes all prior negotiations and writings regarding this matter. Any modification of this Settlement Agreement may be made only in a writing signed by or on behalf of all parties.

Executed this 3rd day of August 2021.

Executed this 3rd day of August 2021.

BRIDGET BRENNAN
Acting United States Attorney
Northern District of Ohio

By: /s/ Karen E. Swanson Haan
KAREN E. SWANSON HAAN
Assistant U.S. Attorneys
Carl B. Stokes U.S. Courthouse
801 West Superior Avenue, Suite 400
Cleveland, Ohio 44113
Telephone: 216.622.3600
Email: Karen.Swanson.Haan@usdoj.gov

Attorney for Defendant

/s/ David A. Kulwicki (per consent)
DAVID A. KULWICKI
Mishkind Kulwicki Law Co., L.P.A.
25550 Chagrin Boulevard, #245
Cleveland, OH 44122
Telephone: 216.595.1900
Email: dkulwicki@mishkindlaw.com

Attorney for Plaintiffs